

March 22, 1999

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DOCKET #98N-1038
DOCKETS MANAGEMENT BRANCH (HFA-305)
FOOD AND DRUG ADMINISTRATION
5630 FISHERS LANE ROOM 1061
ROCKVILLE MD 20852

TO WHOM IT MAY CONCERN:

I wish to comment on the proposed changes in the regulations regarding labeling of irradiated foods.

As a physician, I understand the potential health benefits obtained from sterilization of food using gamma radiation. Nevertheless, I have concerns regarding the potential side effects of this process which I believe warrant the clear labeling of products so treated so that those who do not wish to consume irradiated food may be properly informed.

Although no form of long-term storage is perfect, I believe gamma irradiation opens the door to lackadaisical food processing with the assumption that the irradiation will "take care of the problem." I do not feel that adequate research has been done regarding the changes in vitamin levels and the carcinogenic potential of some of the compounds produced. With these deficiencies in mind, I believe that the American consumer should be allowed to express their preference about the use of the procedure. This demands that adequate labeling be utilized.

I request that:

- * All food products that have been irradiated or which have had any ingredients that have been irradiated must be permanently labeled with declaration of this fact to include the words "irradiated product" or "ingredients exposed to gamma radiation including a logo that clearly indicates that the produce has been irradiated. This labeling must be prominently shown on the main panel of the product's labeling.
- * I believe that the existing "radura" logo is inadequate because it is not an icon that clearly communicates in pictorial form that the product has been exposed to gamma irradiation.
- * For unpackaged products, there must be a prominent poster located with the product that very prominently indicates that the product has been irradiated.

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* Euphemistic wording, such as "cold pasteurized" or "electronic pasteurization" are not acceptable alternatives to the explicit wording noted above.

Sincerely,

A handwritten signature in black ink, appearing to read 'RDN', with a stylized flourish extending to the right.

Richard D. Nagler, M.D.

RDN/ljh



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